

KLF

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April 7, 2008

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Hon. P. Kevin Castel
United States District Judge
500 Pearl St., Room 2260
New York, NY 10007

USDS SDNY
DOCUMENT
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DATE FILED: <u>4/8/08</u>

Re: The Management Group v. Angel Music Group, No. 08-02172

Dear Judge Castel:

This firm represents defendants Nick McCabe, Jessie Angles, Anu Dhami, Isabel Piaggi, and Dan A. Vidal in this action.

I submit this letter to request a pre-motion conference pursuant to Rule 2A of your individual rules of practice. Defendants Angles Dhami, Piaggi and Vidal wish to make a pre-answer motion to dismiss for lack of personal jurisdiction pursuant to F.R. Civ. P. 12(b)(2).

The basis for the motion is that these defendants live in Nevada and Florida and have insufficient contacts with the State of New York to confer jurisdiction on its courts. Defendants were low- and mid-level employees of the plaintiff TMG, and delivered their services from Nevada and Florida to TMG's worldwide client base. At no time did any of them purposefully avail himself of the benefits of conducting business in New York, nor was any one of them present in New York for jurisdictional purposes.

The motion has been drafted and is ready for filing upon completion of the conference. Accordingly, I respectfully request that the Court schedule a pre-motion conference, either in person or by telephone, at its convenience.

Thank you for considering this request.

*I will hold an
initial conference and pre-motion
conference on April 25, 2008 at 2:00pm*
SO ORDERED.
[Signature]
USDJ
4-8-08

KARAAHMETOGLU & LUZ FIRM

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Very truly yours,

A handwritten signature in black ink, appearing to read "Thomas J. Luz", with a stylized, flowing script.

Thomas J. Luz

Cc: Peter Ripin, Esq.
Robert Goldstein, Esq.